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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

LARRY WARREN, Individually,

Plaintiff,

vs.

CITY OF SANTA CRUZ, a public
entity, SANTA CRUZ CHIEF OF
POLICE HOWARD SKERRY, in his
individual and official capacities, and
DOES 1 through 10, Jointly and
Severally,

Defendants.

No. C08-01311-JW

**DECLARATION OF MICHAEL J.
HADDAD IN SUPPORT OF MOTION
FOR WITHDRAWAL OF PLAINTIFF'S
COUNSEL**

Date: June 23, 2008
Time: 9:00 am
Hon. James Ware

STATE OF CALIFORNIA)
COUNTY OF ALAMEDA)

MICHAEL J. HADDAD attests and declares as follows:

1. I am an attorney licensed to practice before all the courts of the State of California and the State of Michigan, and have been admitted to practice before this Court.
2. I am one of the attorneys for Plaintiff in this matter.
3. I have personal knowledge of the facts stated in this declaration. If called upon to testify to same, I am competent to do so.

- 1 4. This is a civil rights/police misconduct case arising from an incident on May 7,
2 2007, where Plaintiff Warren claims he was subjected to excessive force by
3 officers of the Santa Cruz Police Department, resulting in severe injuries including
4 bone fractures. This case was filed on March 6, 2008. All Defendants have been
5 served. By agreement of all counsel, Defendants have not yet answered.
- 6
7 5. I have explained to Plaintiff Larry Warren that if he wishes to prosecute this case,
8 his current counsel would need to withdraw, and he would need to find other
9 counsel or represent herself in this matter. Plaintiff Larry Warren has signed a
10 stipulation agreeing to this withdrawal and agreeing to appear in pro per until he
11 can secure new counsel. (See Declaration of Larry Warren, filed herewith).
- 12
13 6. For reasons of client confidentiality, attorney-client privilege, and duty to Mr.
14 Warren, I cannot disclose to Defendants or in open court the reasons for their
15 need to withdraw as Plaintiff's attorneys in this matter. However, irreconcilable
16 differences exist between Plaintiff and Ms. Sherwin and I has his attorneys about
17 fundamental matters.
- 18
19 7. I have served Mr. Warren with a copy of this motion and supporting papers.

20 I declare under penalty of perjury pursuant to the laws of the State of California
21 that the foregoing information is true and correct. Signed this 10th day of May 2008.
22
23

24 /S/ _____
25 Michael J. Haddad
26
27
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